

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

09/22/2014

General Motors, LLC  
Attn: Benjamin Fogle, Environmental Supervisor  
26427 State Route 281 East  
Defiance, OH 43512

RE: Findings and Orders  
NPDES  
Defiance County  
NPDES Permit 2IN00004

Transmitted herewith is one copy of the Director's Final Findings and Orders in the referenced matter.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel", which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
17th Floor, 77 South High Street  
Columbus, OH 43215

Ed Swindall, Supervisor  
Permit Processing Unit  
Division of Surface Water

ERS/SH  
Certified Mail

cc: D. Martin-Hayden, DSW/NEDO  
S. Hise, DSW  
Permit File (2IN00004)  
Journal Room

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OCT 9 2014

NPDES PROGRAMS BRANCH  
EPA, REGION 5

Date Issued: September 22, 2014  
Date Effective: September 22, 2014

By: Doug Kassir Date: 9-22-14

BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of: General Motors, LLC : Director's Final Findings  
Cooling Water Additive Request : and Orders

Pursuant to the Ohio Revised Code Section 6111.03(H)(4), the Director of the Ohio  
Environmental Protection Agency (Ohio EPA) hereby makes the following Findings and  
issues the following Orders:

FINDINGS

1. General Motors, LLC, owns and operates Defiance Casting Operations, a facility that manufactures parts for automobiles, hereinafter referred to as GM Defiance, located on 26427 State Route 281 East, Defiance, Ohio.
2. GM Defiance currently holds an NPDES permit (No. 2IN00004, OH0002666) for the discharge of wastewater to the Maumee River.
3. Part II, Other Requirements, C of the aforementioned NPDES permit requires that, "In the event that the permittee's operation shall require the use of cooling or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the Ohio Environmental Protection Agency prior to use. Reporting and testing requirements to apply for permission to use additives can be obtained from the Ohio EPA, Central Office, Division of Surface Water, Water Resources Management Section. Reported information will be used to evaluate whether the use of the additive(s) at the concentrations expected in the final discharge will be harmful or inimical to aquatic life."
4. On July 21, 2014, GM Defiance applied to the Ohio EPA to receive written permission for the use of several ChemTreat chemicals in the boiler/cooling water system. These chemicals are described in Attachment A. All discharges are through Outfall 001, which discharges to the Maumee River.
5. The proposed discharge concentrations of the ChemTreat additives entering the Maumee River is detailed in Attachment A.
6. The static acute bioassay information contained in GM Defiance's July 21, 2014 application adequately demonstrates the proposed discharge concentrations listed in Attachment A should not be harmful or inimical to aquatic life, as determined by the procedures in OAC Rules 3745-1-36 and OAC Chapter 3745-2.

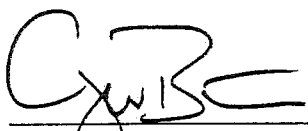
7. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of Chapter 6111 of the Revised Code.

### ORDERS

1. The proposed use of the additives at GM Defiance is approved and is subject to compliance with all applicable laws, rules, regulations, standards, and the conditions contained herein.
  - A. Ohio EPA recognizes that the authorized discharge concentration of some additives in these Findings and Orders is less than 1.0 mg/L, the analytical quantification level for these product residuals. GM Defiance shall control dosing, recycle rates and any treatment to ensure that the discharge will achieve the discharge concentrations.
2. In order to make an alternative proposal, or if additional cooling water additives are needed, a separate request must be submitted to the Ohio EPA, Division of Surface Water, Permit and Compliance Section, Industrial Permits Unit.
3. The cooling water additive treatment program may only be applied in accordance with the proposal approved by the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved proposal without the express, written approval of the Agency. Any deviation from the proposal or the above conditions may lead to revocation of these Findings and Orders and/or other sanctions and penalties provided under Ohio law. Approval of this proposal does not constitute an assurance that the cooling water additive treatment program will operate in compliance with all Ohio laws and regulations. Additionally, the terms and conditions of this approval do not relieve a permitted facility from complying with all monitoring requirements and effluent limitations that have been established in its NPDES permit.

IT IS SO ORDERED:

Ohio Environmental Protection Agency

  
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Craig W. Butler  
Director

9/11/14  
Date

### Attachment A

<i>Additive Name</i>	<i>Additive Purpose</i>	<i>Final Discharge Concentration (µg/L)</i>
BL-1301	Corrosion inhibitor	4.71
BL-1240	Corrosion inhibitor	476
BL-1253	Corrosion inhibitor	125
BL-1544	Corrosion inhibitor	15.5
BL-4350	Corrosion inhibitor	125
CL-215	Biocide	0.615
CL-3858	Iron cleaner	68.0
CL-4059	Dispersant	5.43
CL-4123	Corrosion inhibitor	49.8
CL-450	Bio-film control	4.0
CL-4892	Corrosion/deposit control	65.6
CL-561	pH control	0.5
CL-6033	Corrosion inhibitor	210